

REMARKS

Claim 1 is amended herein. Claims 1-20 remain pending in the present application. No new matter has been added.

Claim Rejections – 35 U.S.C. §101

The present office action states that Claims 1-20 are rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Applicants respectfully disagree in part and overcome in part.

Regarding Independent Claim 1, Applicants have amended Independent Claim 1 herein. Therefore, Applicants respectfully submit that the rejection of Claim 1 under 35 U.S.C. §101 is overcome.

Regarding Independent Claims 7 and 14, Applicants respectfully submit that Claims 7 and 14 do indeed provide a tangible result as defined on page 3 of the Office Action.

On page 3 of the Office Action, Claims 7 and 14 are rejected under 35 U.S.C. §101 as not tangible because there is no express clarification of who or what is performing the steps,...,as these steps could be limited to the mind of a human user.

However, Applicants respectfully point out that Claim 7 clearly states “A computer readable medium having computer readable code embodied therein for causing a computer to perform...” (emphasis added).

Claim 14 also provides a feature “A computer system comprising: a processor; an addressable data bus coupled to said processor; and a memory device coupled to communicate with said processor for implementing a total customer experience action planning process (emphasis added).

Therefore, Applicants respectfully submit that Claims 7 and 14 do, in fact, expressly clarify who or what (e.g., a computer) is performing the steps.

Moreover, as these steps are defined in the scope of a computer or computer system, the Claims are not limited to the mind of a human user (emphasis added). Thus, Claims 7 and 14 do, in fact, meet the criteria regarding a tangible result as outlined in the Office Action because there is clarification of whom or what is performing the steps.

Claim Rejections - 35 U.S.C. §102

The present office action states that Claims 1-3, 5, 7-9, 11, 14-16 and 18 are rejected under 35 U.S.C. § 102(b) as being anticipated Casper Lassenius, Maarit Nissinen, Kristian Rautiainen And Reijo Sulonen's "The Interactive Goal Panel: A Methodology For Aligning R&D Activities With Corporate Strategy", published in October 1998 (hereinafter Lassenius). Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 1-3, 5, 7-9, 11, 14-16 and 18 are not anticipated by Lassenius for the following rationale.

Applicants respectfully submit that Independent Claims 1, 7 and 14 include the feature "gathering data associated with an organization and customers of said organization" (emphasis added). Support for the Claimed feature can be found throughout the Specification including page 22 lines 12-14 and page 23 lines 20-page 24 line 8 (addressing the data associated with customers of the organization) and page 22 lines 16-18 and page 24 lines 10-20 (addressing the data associated with organization).

Applicants have reviewed Lassenius and do not understand Lassenius to anticipate the feature of gathering data associated with an organization and also gathering data associated with customers of the organization. That is, Applicants

do not understand Lassenius to anticipate gathering data associated with an organization and customers of the organization (emphasis added).

Therefore, Applicants respectfully state that Independent Claims 1, 7 and 14 are not anticipated by Lassenius and as such, Claims 1, 7 and 14 are allowable as they overcome the rejection under 35 U.S.C. § 102(b).

With respect to Claims 2-3 and 5, Applicants respectfully state that Claims 2-3 and 5 depend from the allowable Independent Claim 1 and recite further features of the present claimed invention. With respect to Claims 8-9 and 11, Applicants respectfully point out that Claims 8-9 and 11 depend from the allowable Independent Claim 7 and recite further features of the present claimed invention. With respect to Claims 15-16 and 18, Applicants respectfully point out that Claims 15-16 and 18 depend from the allowable Independent Claim 14 and recite further features of the present claimed invention. Therefore, Applicants respectfully state that Claims 1-3, 5, 7-9, 11, 14-16 and 18 are allowable as pending from allowable base Claims.

Claims 3, 9 and 16

Regarding Claims 3, 9 and 16, Applicants respectfully agree with the Examiner's statement that the feature "wherein said data further comprises data provided by a partner organization that works together with said organization " of Claims 3, 9 and 16 is not explicitly taught by Lassenius.

For this additional reason, Applicants respectfully submit that Claims 3, 9 and 16 are not anticipated by Lassenius. As such, Applicants respectfully submit that Claims 3, 9 and 16 overcome the rejection under 35 U.S.C. § 102(b).

Rejection under 103(a)

Claims 4, 6, 10, 12-13, 17 and 19-20

In the Office Action, the Examiner rejected Claims 4, 6, 10, 12-13, 17 and 19-20 under 35 USC 103(a) as being unpatentable over Lassenius as applied to Claim 1 (and 7 and 14), and further in view of Gary Meyer's discussion of eWorkbench in "eWorkbench: Real-time Tracking Of Synchronized Goals", published in the April 2001 issue of HRMagazine (hereinafter Meyer). Applicants have reviewed the cited reference and respectfully submit that the present invention is not rendered obvious over Lassenius in view of Meyer for the following rationale.

With respect to Claims 4 and 6, Applicants respectfully state that Claims 4 and 6 depend from the allowable Independent Claim 1 and recite further features of the present claimed invention.

With respect to Claims 10 and 12-13, Applicants respectfully state that Claims 10 and 12-13 depend from the allowable Independent Claim 7 and recites further features of the present claimed invention.

With respect to Claims 17 and 19-20, Applicants respectfully state that Claims 17 and 19-20 depend from the allowable Independent Claim 14 and recites further features of the present claimed invention.

Therefore, Applicants respectfully state that Claims 4, 6, 10, 12-13, 17 and 19-20 overcome the rejection under 35 U.S.C. §103(a) as being unpatentable over Lassenius in view of Meyer. As such, Applicants respectfully submit that Claims 4, 6, 10, 12-13, 17 and 19-20 are allowable as pending from allowable base Claims and reciting additional features.

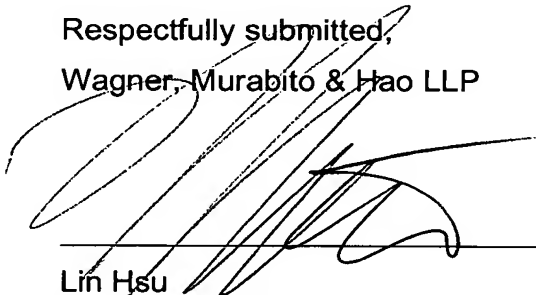
CONCLUSION

Based on the arguments presented above, Applicants respectfully assert that Claims 1-20 overcome the rejections of record, and therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

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Respectfully submitted,
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